

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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Case No. 1:03-md-01570-GBD-SN

This document relates to:

*Gaston, et al. v. The Islamic Republic of Iran, No.  
18-cv-12337*

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**MOTION TO SUBSTITUTE PARTIES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Fed. R. Civ. P. 15(d) Plaintiffs move the Court to allow substitution of the following parties in the above referenced action. The individual being substituted into the case is personal injury plaintiff Marianne Kelly. Christopher Kelly, her spouse, also a personal injury plaintiff, was erroneously included twice in the Appendix to the Complaint. The allegation of Christopher Kelly, referenced in 18-cv-12337 ECF 1 at Allegation 57 of Appendix 1, will remain unchanged as indicated below.

The following chart demonstrates the how these parties were previously named in the Complaint and how they wish to proceed going forward:

| Identification of Party To be Substituted | Previous Reference to Plaintiff in ECF (18-cv-12337) | State of Residence at Filing | Paragraph of Complaint Discussing Plaintiff            |
|---|--|------------------------------|--|
| Christopher Kelly                         | Christopher Kelly                                    | New York                     | ECF No. 1 (18-cv-12337) at Allegation 57 of Appendix 1 |
| Marianne Kelly                            | Christopher Kelly                                    | New York                     | ECF No. 1 (18-cv-12337) at Allegation 58 of Appendix 1 |

Plaintiffs propose that, upon endorsement of the Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of Court's Office and based on the size of this MDL.

Dated: April 15, 2025

Respectfully submitted,

/s/ Robert Keith Morgan  
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